



BEFORE THE ARIZONA CORPORATION COMMISSION

Bob Stump, Chairman
Gary Pierce, Commissioner
Brenda Burns, Commissioner
Bob Burns, Commissioner
Susan Bitter Smith, Commissioner

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Arizona Corporation Commission
DOCKETED

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Docket No. E-01345A-13-0140

IN THE MATTER OF THE APPLICATION
OF ARIZONA PUBLIC SERVICE
COMPANY FOR APPROVAL OF ITS 2014
RENEWABLE ENERGY STANDARD
IMPLEMENTATION PLAN FOR RESET
OF RENEWABLE ENERGY ADJUSTOR

ORIGINAL

**RESPONSE OF THE SOLAR ENERGY INDUSTRIES ASSOCIATION TO ARIZONA
PUBLIC SERVICE COMPANY'S SUPPLEMENTAL APPLICATION (UTILITY-
OWNED DG)**

The Solar Energy Industries Association (SEIA)¹ provides these comments in response to Arizona Public Service Company's (APS) recently proposed AZ Sun DG program. SEIA is encouraged by APS' acknowledgement of the benefits of deploying distributed generation (DG). In general we support programs that provide additional opportunities for solar DG deployment. However, because this proposal represents a major departure from Arizona's existing approach to DG we believe it requires especially careful consideration. We do not believe the current proposal provides sufficient detail to warrant approval at this time. SEIA intends to provide more substantive comments on the merits of the AZ Sun DG proposal at a later date.

In the meantime, we urge the Commission not to rush to judgment by expediting approval of this program and instead allow sufficient time for a more thoughtful analysis. SEIA is cognizant of APS' obligation to acquire a certain amount of renewable energy resources by December 31, 2015 as established by Decision No. 71448. We believe more information is needed about this proposal's relationship to that obligation. At a minimum, we believe the Commission and other interested parties could better evaluate this matter if APS were to identify

¹ The comments contained in this filing represent the position of SEIA as an organization, but not necessarily the views of any particular member with respect to any issue.

1 the specific renewable energy resources either in service or under development that are currently
2 anticipated to meet APS' 2015 compliance obligation (and any remaining shortfall).
3 Additionally, we are very concerned that APS is asking the Commission to make a decision
4 regarding a provision of a major rate case Settlement Agreement – voted on by five
5 Commissioners and agreed to by multiple parties in 2009 – and to do so in a few short months.²
6 For these reasons, and because this proposal represents such a large-scale policy change, we
7 strongly urge the Commission to apply a deliberate approach to this matter by conducting
8 workshops on this application or considering it in APS' 2015 REST Plan. This would provide all
9 interested parties sufficient opportunity to comment on APS' proposal, as well as to develop the
10 information the Commission would need in order to consider this application.

11 Respectfully submitted this 20th day of August, 2014,

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28 ² See Decision No. 71448, pgs. 13-14.

1 **Original and 13 copies filed on this 20th day of August, 2014 with:**

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